

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

JOHN NOAKES

Plaintiff

v.

CASE WESTERN RESERVE  
UNIVERSITY,

Defendant

Case No. 1:21-cv-1776-PAB

Judge: BARKER

NOTICE OF FILING OF POSITION  
PAPER ON PROPOSED FERPA  
PROTECTIVE ORDER

Plaintiff hereby provides notice of the submission of the accompanying Position Paper in accordance with the Court's Discovery Dispute Standing Order. This Position Paper is intended to address the issue surrounding a proposed protective order.

Respectfully submitted,

/s/ Joshua Engel  
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Anne Tamashasky (0064393)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been electronically served via the Courts ECF system this December 2, 2022 upon all counsel of record. I further certify that a copy was served on Jane Roe by email.

/s/ Joshua Adam Engel  
Joshua Adam Engel (0075769)